1 2 3 4 5 6 7 8	LAW OFFICE OF BENJAMIN RAMOS Benjamin Ramos (State Bar No. 156643) 705 E. Bidwell, Suite 2-359 Folsom, CA 95630 Telephone: (916) 358-9842 Email: benjaminramos@comcast.net  Appointed Attorney for Defendant, CHRISTOPHER RYAN BUSBY	ES DISTRICT COURT	
	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	UNITED STATES OF AMERICA,	Case No.: 2:15-cr-00353-GMN-NJK	
12 13	Plaintiff, v.	STIPULATION FOR DISCOVERY AND RESCHEDULING OF EVIDENTIARY	
14 15 16	CHRISTOPHER RYAN BUSBY,  Defendant.	HEARING; ORDER  (SEVENTH REQUEST TO RESCHEDULE EVIDENTIARY HEARING)	
17 18	IT IS HEREBY STIPULATED AND AGREED,	, by and between Sigal Chattah, United States Attorney,	
19	and Melinda Brewer, Assistant United States Attorney, and Benjamin Ramos, Esq., appointed counsel		
20	for the Defendant/Movant, Christopher Ryan Busby, that:		
21	(a) The evidentiary hearing on Movant's Motion Pursuant to 28 U.S.C. § 2255 to Vacate, Set		
22	Aside, or Correct Sentence by a Person in Federal Custody (ECF No. 184), currently set for		
23	Monday, May 12, 2025, be vacated and continued to Monday, June 30, 2025, at 9:00 a.m.; and		
24	(b) The deadline for the parties' joint preliminary brief be vacated and continued to Monday,		
25	June 16, 2025, to allow time for the completion of discovery as described below.		
26	This stipulation is entered into for the following reasons:		
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		AND EVIDENTIARY HEARING DATE	

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- The parties agree that some discovery—including targeted interrogatories and document requests—is necessary to develop the factual record regarding the eleven remaining ineffective assistance of counsel claims. The requested discovery will facilitate a more efficient resolution of the evidentiary hearing by addressing factual disputes and minimizing unnecessary testimony.
- 2. Appointed counsel has conferred with government counsel, AUSA Melinda Brewer, who has agreed to movant's submission of 10 interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure, directed to the government's forensic analyst, Matt Trafford, who analyzed both the Dell laptop and the blue HP laptop seized in this case and prepared a written report of his findings. (See Discovery 0100–0109.)
- Government counsel has also produced additional documents at the request of Busby's appointed attorney.
- 4. This is the seventh request for a continuance filed in this matter.
- 5. Accordingly, the parties jointly request that the Court continue the evidentiary hearing to June 30, 2025, and extend the deadline for the joint preliminary brief to June 16, 2025.

IT IS SO STIPULATED.

Dated: Apri	1 17, 2025	SIGAL CHATTAH (Interim) United States Attorney
		/s/ Melinda Brewer
		Melinda Brewer, Assistant United States Attorney
Dated: Apri	1 17, 2025	LAW OFFICE OF BENJAMIN RAMOS
		/s/ Benjamin Ramos

BENJAMIN RAMOS (SBN 156643) Attorney for Defendant/Movant

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